

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM
POWER PRODUCTS MARKETING, SALES
PRACTICES, AND PRODUCTS LIABILITY
LITIGATION

No. 3:16-md-02738-MAS-RLS

MDL No. 16-2738 (MAS) (RLS)

**DECLARATION OF MATTHEW L. BUSH IN SUPPORT OF
DEFENDANTS' OPPOSITION TO THE PLAINTIFF'S STEERING
COMMITTEE'S MOTION TO EXCLUDE THE GEOLOGY OPINIONS OF
DRS. MARY POULTON AND LAURA WEBB**

I, Matthew L. Bush, declare as follows:

I am an attorney and a partner with the law firm King & Spalding LLP, counsel for Defendants Johnson & Johnson and LLT Management, LLC (hereafter, "Defendants") in the above-captioned matter. The facts stated in this Declaration are true of my own personal knowledge. I submit this Certification in Support of Defendants' Opposition to the Plaintiff's Steering Committee's Motion to Exclude the Geology Opinions of Drs. Mary Poulton and Laura Webb.

1. Attached hereto as **Exhibit 1** is a true and correct copy of Dr. Mary Poulton's expert report dated February 25, 2019, issued in this case.

2. Attached hereto as **Exhibit 2** is a true and correct copy of Dr. Laura Webb's expert report dated February 25, 2019, issued in this case.

3. Attached hereto as **Exhibit 3** is a true and correct copy of Dr. Robert Cook's deposition on January 30, 2019, in this case.

4. Attached hereto as **Exhibit 4** is a true and correct copy of Dr. Robert Cook's amended expert report dated January 22, 2019, issued in this case.

5. Attached hereto as **Exhibit 5** is a true and correct copy of Coggiola M, Bosio D, Pira E et al. *An update of a mortality study of talc miners and millers in Italy*. Am J Ind Med. 2003 Jul;44(1):63-9. doi: 10.1002/ajim.10240. PMID: 12822137.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: August 22, 2024



Matthew L. Bush